

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JOHN GIDDIENS,)	
on behalf of himself and all others)	
similarly situated)	
)	
Plaintiff,)	C.A. No. 12-cv-02624-LDD
v.)	
)	CLASS ACTION
FIRST ADVANTAGE LNS SCREENING)	
SOLUTIONS, INC, F/K/A LEXISNEXIS)	
SCREENING SOLUTIONS, INC.)	
)	
Defendant.)	
)	

**MOTION TO PERMIT FILING OF DOCUMENTS IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT UNDER SEAL**

Plaintiff John Giddiens, by counsel, respectfully requests that the Court enter the attached proposed Order permitting the filing under seal of certain documents relating to Plaintiff's Motion For Final Approval of Class Action Settlement ("Motion"), and assigns the following reasons in support thereof.

1. In accordance with the Protective Order of this Court entered December 20, 2012 (Doc. 21), Defendant First Advantage LNS Screening Solutions, Inc., f/k/a LexisNexis Screening Solutions, Inc. ("Defendant" or "LNSSI") has marked certain documents and deposition testimony as "Confidential."

2. Plaintiff seeks to file the following material that has been marked as confidential in support of the Motion: select portions of the transcript of the deposition of Defendant's corporate representative Charles Oyler (attached to the Motion as Exhibit A), and select portions of Defendant's Supplemental Response to Plaintiff's Interrogatory No. 8 (attached to the Motion as Exhibit B).

3. Pursuant to the Protective Order, at paragraph 14, and Local Rule 5.1.5(a)(2), documents in this case may be filed under seal only if the Court first enters an Order allowing the filing under seal.

WHEREFORE, Plaintiff John Giddiens respectfully requests that this Honorable Court grant this Motion and enter an Order in the form proposed herewith, permitting Plaintiff to file under seal documents designated as "Confidential."

Dated: November 21, 2014

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

By: /s/ James A. Francis
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[PROPOSED] ORDER ALLOWING FILING UNDER SEAL

This matter is before the Court on the Plaintiff's Motion to Permit Filing Under Seal of certain documents designated as "Confidential" relating to Plaintiff's Motion for Final Approval of Class Action Settlement contained in Exhibits A and B attached thereto. Upon consideration of this matter, the Court hereby ORDERS that the Motion is GRANTED.

IT IS SO ORDERED, this _____ day of _____, 2014.

BY THE COURT:

Date:

LEGROME D. DAVIS, U.S.D.C.

CERTIFICATE OF SERVICE

I, **JAMES A. FRANCIS**, do hereby certify that, on this date, I caused a true and correct copy of the foregoing to be served via the Court's ECF Notification system upon all counsel of record.

/s/ James A. Francis
JAMES A. FRANCIS

Dated: November 21, 2014